

Mary E. Flynn
Partner
(212) 735-8631
mflynn@morrisoncohen.com

January 3, 2018

BY E-FILING AND HAND DELIVERY

The Honorable Lewis A. Kaplan
Daniel Patrick Moynihan United States Courthouse
500 Pearl Street
New York, New York 10007

RE: *Yukos Capital S.A.R.L., et al. v. Feldman*, No. 15 civ. 4964 (LAK) (S.D.N.Y.)

Dear Judge Kaplan:

We represent the Plaintiffs in the above-captioned action and write, per the Court's request, regarding potential trial dates after January 31, 2018. Plaintiffs' conflicts after January 31 are as follows:

Week of January 29 – February 2: I am lead counsel in the arbitration *36 East 20th St. Realty Co. LLC v. Green 8-LLC*.

February 7 - 16: Glen Summers, co-counsel for Plaintiff Marc Fleischman, has a trial in the Eastern District of Texas in *Sycamore IP Holdings LLC v. Verizon Communications, Inc.*

February 26 to March 30: Witness Thomas Walford has a trial in London and then a trial in Singapore at which his presence is required. Plaintiff Marc Fleischman also has a previously-scheduled trip out of the country from March 1 - 12. (Counsel also has brief conflicts on various dates within that period).

April 23 - 24: I am lead counsel in a trial in New York Supreme Court: *Highbridge House Ogden LLC v. Highbridge Entities LLC*.

April 16 - 27: Glen Summers, co-counsel for Plaintiff Marc Fleischman, has a trial set to begin on April 23, 2018 in the Eastern District of Texas in *Sycamore IP Holdings LLC v. Teleport Communications America, LLC*.

Given these conflicts and defense counsel's limited availability after February 12, Plaintiffs respectfully request that the Court set a firm trial date for the trial to begin on or after April 30, 2018. Given the court's prior order that the trial may begin that day, we have been able to block out the week of April 30 and the week following. Additionally, having out-of-town and overseas

MorrisonCohen_{LLP}

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January 3, 2018

Page 2

witnesses continuing to be on 5 days' notice for many months is proving to be difficult to manage with their family and business commitments.

Respectfully submitted,



Mary E. Flynn

cc: Rishi Bhandari, Esq. (counsel for Defendant) (by e-filing)
Glen Summers, Esq. (co-counsel for Plaintiff Marc Fleischman) (by e-filing)